

1 **KYLE R. KNAPP**

2 **Attorney at Law**

3 California State Bar No. 166597

4 916 2nd Street, 2nd Floor

5 Sacramento, CA 95814

6 Telephone:(916) 441-4717

7 Attorney for Agustin Gonzalez

8 UNITED STATES DISTRICT COURT

9 EASTERN DISTRICT OF CALIFORNIA

10 UNITED STATES OF AMERICA,

11 Plaintiff,

12 v.

13 AGUSTIN GONZALEZ,

14 Defendant.

) CASE NO. 2:24-CR-0012-TLN

)
)
) STIPULATION AND ORDER TO SET NEW
) JUDGMENT AND SENTENCING DATE & NEW
) DISCLOSURE SCHEDULE

) DATE: May 15, 2025

) Time: 9:00 am

) COURT: Hon. Troy L. Nunley

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18 IT IS HEREBY STIPULATED by and between the parties hereto through their respective
19 counsel, Emily Sauvageau, Assistant United States Attorney, attorney for plaintiff and Kyle Knapp,
20 attorney for defendant, AGUSTIN GONZALEZ, that the previously scheduled sentencing date of May
21 15, 2025, be vacated and the matter set for sentencing on **September 4, 2025, at 9:30 a.m.**

22 This continuance is requested to finalize all sentencing mitigation work and research new factual
23 issues implicated by the final psr. In addition, lead counsel for the government, Cameron Desmond, is on
24 leave and most importantly, Mr. Gonzalez has at least one surgery that has not yet been scheduled on his
25 eyes and needs potentially a second surgery to deal with complications from his kidney disease. I have
26 contacted Ms. Sauvageau and Mr. Davis from probation and neither have an objection with a continuance
27 and the new sentencing date.

28 In light of the above request, the following revised sentencing schedule is requested: Judgment
and Sentencing – September 4, 2025; Reply or Statement of Non-Opposition to Motion to Correct PSR;

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2 August 28, 2025; Motion to Correct PSR due August 21, 2025. The Final Presentence Report was filed
3 last week.
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5 Dated: April 24, 2025

Respectfully submitted.

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7 /s/ Kyle R. Knapp
8 Kyle R. Knapp
9 Attorney for Defendant Agustin Gonzalez
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11 Dated: April 24, 2025

Respectfully submitted.

12 /s/ Emily Sauvageau
13 Emily Sauvageau
14 Assistant U.S. Attorney
15 Attorney for Plaintiff

16 IT IS SO ORDERED.

17 DATED: April 29, 2025

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19 TROY L. NUNLEY
20 CHIEF UNITED STATES DISTRICT JUDGE
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